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MEMORANDUM

FROM: Jim Christiansen, RPM, Libby Asbestos Site 11/1/02

TO: Arturo Holguin, Senior Analyst, GAO

SUBJECT: Documents concerning Libby planning process in 2002

Pursuant to our meeting on October 30, 2002, I began to gather documents which described or demonstrated our planning process regarding general project management, analytical issues, and risk assessment for submission to you. I thought a summary/discussion for each set of documents would be helpful

GENERAL PROJECT PLANNING

At this time, the site is currently in transition from the removal program (Paul) to the remedial program (Jim). As such, my program has not yet generated many detailed planning and contracting documents, except for work I managed this summer (basically, the Contaminant Screening Study). Rather, in the past few months I have focused on "big picture" issues I must address prior to initiating actions on behalf of my program beginning next calendar year - when the remedial program takes over the site. The documents, mostly emails, I am providing for general project planning demonstrate this:

- when and how the site transitions
- estimates and communications for FY 2003 budget
- changes in the Libby "team"
- general site plans

As we move into 2003, I expect to rework many of the "details" surrounding how we do cleanup, per some of the general discussion in the documents attached. For instance, as we work out analytical issues discussed in the accompanying documents and start to better define the "universe" of cleanups with soil sampling results, we will be doing extensive planning this winter to define how we will conduct cleanup and advance investigation where necessary based on those results.

ANALYTICAL ISSUES

The number of communications and planning emails regarding analytical issues is very large. I included a few key deliverable documents and a few emails which discuss EPA's planning and decision making. The summary below will help put those documents into context.

Starting Conditions in early 2002

As the remedial program became involved and began planning for taking over the investigation and cleanup at Libby in early 2002, it became clear that the one of the key analytical issues was quantifying Libby asbestos in soils. This would be a key task for sampling and screening properties throughout the Libby area. Though several analytical methods were available and some were common, none were obvious candidates to be chosen as the method of choice for screening/analysis of Libby soils on a large production scale. It is beyond the scope of this memo to go into the details of individual methods, but many methods, some common and some not, were considered early on as potential candidates to analyze samples collected during the Contaminant Screening Study (CSS). Discussions with Libby team members from EPA, Volpe, CDM, SRC, and USGS suggested that for the requirements we had outlined during planning the CSS and in the CSS Sampling Plan itself, infrared spectroscopy (IR) - as being developed by both USGS and EMSL - and scanning electron microscopy (SEM) - available at many labs - were good candidates. Again, the reasons for this are beyond the scope of this memo. This decision is reflected the CSS Sampling Plan.

Plan to test analytical methods in a quick, cost-effective manner

Before the remedial program was involved, and understanding the many challenges regarding analysis of asbestos, EPA was planning and scoping a Performance Evaluation (PE) Study to evaluate several asbestos analytical methods. At the time the remedial program became involved, there was a written plan for this study (June 2000) that had not yet been implemented. Upon review, it became apparent the plan was a bit outdated, that there were still many issues which needed resolved prior to starting the study, and in fact, was very broad. I decided to focus the study in the short-term specifically on PLM, IR, and SEM, to help me determine in a reasonable time which of these methods, or combination, would be most effective for meeting the data quality objectives in the CSS Sampling Plan. Based on input from the team, we elected to move forward on development of "interim test materials." Through this exercise, we could accomplish several things:

- Perfecting methods to prepare reference materials used to test the methods.
- Obtaining data on PLM, IR, and SEM to aid in understanding, and quantifying, the pros and cons of each method. This includes sample preparation and the various connotations of the methods themselves. The ultimate goal was to develop an SOPs for the method(s), sample preparation, and quality assurance, which was to be used in analyzing CSS samples.
- Moving forward with revising the overall PE study.

Data from the first round of testing is presented in three technical memos prepared by SRC. Based primarily on the results, I elected to move forward with development of both IR and SEM, with an emphasis on IR as the primary method for the CSS due to cost. This would involve improving the SOPs, improving sample preparation methods, and moving forward with contracting. We also elected to perform a second round of interim soil test materials (ISTM2) concurrently.

Recent actions

As contracting issues with EMSL came to a point of decision in fall of 2002, EMSL informed EPA that they were unwilling to enter into a contract to perform IR analysis at that time. So, I instructed the team to refocus efforts on getting SEM up to speed for use in the CSS, and to move forward quickly with ISTM2 to test its effectiveness as well as changes in sample preparation. ISTM2 is currently in progress with results expected soon - based on these results we will select an analytical approach for the CSS (assuming acceptable results) and also continue planning/implementing/revising the greater PE study. The results of all of this work will be used to guide future analytical activities.

RISK ASSESSMENT

As early as 2000, Region VIII was clear in our assertion that current risk tools were not satisfactory for evaluating risk in Libby. Our first effort on this front involved packaging and pushing the Berman-Crump Risk Model to HQ for review and possible inclusion in the IRIS database. We regard the model as a definite improvement in addressing cancer risks from asbestos. However, though the model was originally submitted in Fall 2001, little action has been taken to date and it appears now that it will take years to review and approve. This is somewhat typical for IRIS reviews, but I had hoped this effort may be fast-tracked. This time frame will likely be of no help in Libby, where we must make decisions and publish a risk assessment in a matter of only a couple years. I believe I have made that issue clear to HQ.

Region VIII has elected to move forward with a site-specific inhalation study to support risk assessment at Libby. We are currently in the early planning stages and there are few written "plans" at this point. The general approach is discussed in several of the general planning documents.